

EXHIBIT 1
Redacted Version of
Document Sought to be Sealed

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: FACEBOOK, INC. CONSUMER
PRIVACY USER PROFILE LITIGATION,

This document relates to:

ALL ACTIONS

Case No. 3:18-MD-02843-VC

**SUPPLEMENTAL DECLARATION OF
STEVEN WEISBROT OF ANGEION
GROUP, LLC IN SUPPORT OF
MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT**

1 I, Steven Weisbrot, Esq., declare under penalty of perjury as follows:

2 1. I am the President and Chief Executive Officer at the class action notice and claims
3 administration firm Angeion Group, LLC (“Angeion”). I am fully familiar with the facts attested to
4 herein based upon my personal knowledge.

5 2. My credentials were previously reported to this Court in my initial declaration that was filed
6 with Plaintiffs’ Notice of Motion and Motion to Certify a Settlement Class and Grant Preliminary
7 Settlement Approval (Dkt. 1096-2) (the “Notice Plan Declaration”).

8 3. The purpose of this declaration is to provide the Parties and the Court with an update to my
9 previous declaration (Dkt. 1145-2).

10 **SETTLEMENT WEBSITE & TOLL-FREE TELEPHONE SUPPORT**

11 4. As of August 2, 2023, 2,089,706 visitors to the Settlement Website engaged with the chatbot.

12 5. As of August 2, 2023, Angeion has received and answered 154,809 email inquiries. These
13 inquiries consist of various questions related to the Settlement.

14 6. As of August 2, 2023, the Settlement Website has had 61,622,242 unique visitors¹ and
15 95,200,798 page views.

16 7. As of August 2, 2023, the toll-free line has received approximately 33,368 calls, totaling
17 157,565 minutes. 2,870 Class Members left a voicemail for the Settlement Administrator requesting a
18 copy of the Long Form Notice and/or Claim Form to be mailed to them. Accordingly, Angeion has
19 fulfilled these requests for Long Form Notices and/or Claim Forms.

20 **CLAIMS ADMINISTRATION**

21 **Claim Form Submissions**

22 8. The deadline for Class Members to submit a claim is August 25, 2023. As of August 2, 2023,
23 Angeion has received a total of 19,027,181 Claim Form submissions (19,006,636 online submissions
24 and 20,545 submissions by mail).

25 9. Angeion performed an additional preliminary review of the 17,371,380 online claims received
26 by July 27, 2023 and identified 1,156,787 claims as duplicative of another claim submitted. Of the

27
28 ¹ Google Analytics creates a unique ID, stored in a browser’s cookies, which is used to determine the
number of unique visitors to a website. Unique visitors represent how many of these unique IDs access
the Settlement Website.

1 16,214,593 unique online claims submitted, 14,732,834 claims were submitted for a current account,
2 1,440,326 claims were submitted for a deleted account(s) and 41,433 claims were submitted for both
3 a current and deleted accounts. Angeion was able to match 7,627,747 of the claims submitted for a
4 current account to the Class List provided by Defendant, which contained a list of only current
5 Facebook users.

6 10. Angeion performed a preliminary fraud analysis of the online claims submitted and identified
7 3,131,829 claims as potentially fraudulent. Claims have been identified as potentially fraudulent based
8 on the following criteria: [REDACTED]

9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED].

19 11. We have instructed Class Counsel to redact the information in the prior paragraph because it
20 discusses our anti-fraud efforts and, if disclosed, may undermine our ability to combat fraudulent
21 claims. Fraud detection is especially important as fraudulent claim submissions in certain types of
22 class action settlements are becoming increasingly prevalent⁴. Angeion's thorough and comprehensive
23 review in identifying over 3.1 million potentially fraudulent claim submissions will help maintain the
24

25 _____
26 ² Angeion typically uses a threshold of 5-6 claims per IP Address as potentially fraudulent but due to
the volume of claims filed, class size, and public availability of qualifying information in this matter,
Angeion has increased our threshold accordingly.

27 ³ This analysis serves to catch potential fraudulent actors who use a VPN to cycle through different
IP addresses.

28 ⁴ See <https://www.law.com/newyorklawjournal/2023/07/26/the-increasing-danger-of-fraudulent-claims-in-class-action-settlements/>.

1 integrity of the Settlement Fund by ensuring only eligible Class Members are identified to receive
2 payments, and is best practices consistent with industry standards. Moreover, as a percentage of
3 submitted claims, the number of potentially fraudulent claims identified in this matter is consistent
4 with other similar settlements.

5 12. Additionally, Angeion has worked with the Parties to implement measures to counteract efforts
6 by bad actors who are attempting to exploit the settlement process in order to obtain personal
7 information from Class Members. For example, the Settlement Website was updated to include an
8 alert on the home page and an additional FAQ was added to inform Class Members of potential bad
9 actor attempts to obtain personal information, *see Exhibit A*. Further, Angeion has provided
10 information to the Parties so that known bad actor Facebook accounts can be removed.

11 13. After the deadline to submit a claim, Angeion will provide the Parties and the Court with a
12 subsequent declaration regarding the total number of valid claims.

13 **Requests For Exclusion**

14 14. The deadline for Class Members to request exclusion from the Settlement was July 26, 2023.
15 As of August 2, 2023, Angeion has received 21,595 requests for exclusion. Angeion has performed a
16 deduplication of the exclusion requests received and has identified that 20,212 unique Class Members
17 have submitted an exclusion request.

18 15. Angeion compared the list exclusion requests received to Claim Forms submitted and
19 determined that 3,942 Class Members have submitted both an exclusion request and a Claim Form.
20 Angeion will reach out to these 3,942 Class Members to determine if the Class Member's intention
21 was to submit a Claim Form or to exclude themselves from the Settlement. Angeion will provide the
22 Parties and the Court with a report and subsequent declaration regarding the total number of valid
23 exclusion requests it received prior to the final hearing.

25 I hereby declare under penalty of perjury that the foregoing is true and correct.

26 Dated: August 4, 2023


27 STEVEN WEISBROT
28

Exhibit A

In re: Facebook, Inc. Consumer Privacy User Profile Litigation

Case No. 3:18-md-02843-VC

United States District Court for the Northern District of California

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ALERT REGARDING REQUESTS FOR SENSITIVE PERSONAL INFORMATION OR PAYMENT TO SUBMIT CLAIMS

Please click [here](#) for more information.

If you were a Facebook user in the United States between May 24, 2007, and December 22, 2022, inclusive, you may be eligible for a cash payment from a Class Action Settlement.

Para leer el aviso en español, haga [clic aquí](#).

ALERT REGARDING REQUESTS FOR SENSITIVE PERSONAL INFORMATION OR PAYMENT TO SUBMIT CLAIMS

29. ALERT REGARDING REQUESTS FOR SENSITIVE PERSONAL INFORMATION OR PAYMENT TO SUBMIT CLAIMS

Angeion Group, LLC has been appointed as the sole Settlement Administrator by the Court.

- The Settlement Administrator will **not** ask for your social security number as part of the claim submission or administration process. It will only ask for the information required by the [Claim Form](#) or otherwise approved by a Court order, with the exception of limited information it may request to validate claims it cannot verify.
- The Settlement Administrator will **not** ask you to make any payment as part of the claim submission or administration process.
- The Settlement Administrator will **not** provide an estimate of the amount of your claim. It will pay valid claims if (and only if): (1) the Court issues an order granting final settlement approval; and (2) appeals of that order are resolved or the time to appeal that order expires. At that point, the Settlement Administrator will make payment in the method you choose on your Claim Form.
- The Settlement Administrator will **not** send you a text message and will **not** ask you to text them.

Communications requesting or providing the information in the above bullets or contacting you by text messaging are **not** authorized by the Court and it is possible they are efforts to defraud. If you have any questions, please contact the Settlement Administrator by emailing info@FacebookUserPrivacySettlement.com, calling 1-855-556-2233, or sending mail to Facebook Consumer Privacy User Profile Litigation, c/o Settlement Administrator, 1650 Arch Street, Suite 2210, Philadelphia, PA 19103.